

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SAEED PIROOZ,)	
)	
Plaintiff,)	
)	
v.)	Cause No.:4:05MC00521 CDP
)	
MEMC ELECTRONIC MATERIALS, INC.,)	
)	
Defendants.)	

MOTION TO STAY CONFIRMATION OF ARBITRATION AWARD

COMES NOW Defendant, MEMC Electronic Materials, Inc., by and through counsel, Sauter Sullivan, LLC, and hereby requests an order staying confirmation of the arbitration award which is the subject of Plaintiff's Complaint for Confirmation of Arbitration Award and Entry of Judgment. In support of this Motion, Defendant states it has contemporaneously filed a Motion to Vacate Arbitration Award and Memorandum in Support which may moot Plaintiff's Complaint. Plaintiff's Complaint and Defendant's Motion to Vacate involve the same subject matter, a July 8, 2005 arbitration decision and award. As such, Plaintiff's Complaint should be stayed pending a ruling on Defendant's Motion to Vacate Arbitration Award.

WHEREFORE, Defendant prays for an order of this Court staying any proceeding for confirmation of the arbitration award until such time as a final order or judgment is provided by the Court on Defendant's Motion to Vacate Arbitration Award , and for such other and further relief as the Court deems just and proper.

Dated: October 7, 2005

SAUTER SULLIVAN, LLC

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Certificate of Service

The undersigned hereby certifies that a copy of the foregoing Motion to Stay Confirmation of Arbitration Award was electronically filed and served on counsel of record via first class U.S. Mail on this 7th day of October, 2005.

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/s/ Christopher K. Geldmacher